



**Count Two**

On or about January 22, 2018 in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**DANIEL SEPULVEDA  
JOSE LUIS GARCIA**

**EDGAR YVAN MORENO BARRAGAN**

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is, approximately 123 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

**Count Three**

On or about January 17, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**EVARISTO SEPULVEDA, III  
JUAN INDALECIO GARCIA  
JOSE LUIS GARCIA  
and  
RENE SEPULVEDA**

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is, approximately 320 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

**Count Four**

On or about August 30, 2019, in the Southern District of Texas, and within the jurisdiction of the Court, defendant,

**JOSE LUIS GARCIA**

did knowingly conduct, and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of \$275, 205.00 in United States currency which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity.

In violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

**Count Five**

On or about August 30, 2019, in the Southern District of Texas, and within the jurisdiction of the Court, defendant,

**DANIEL SEPULVEDA**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of \$83,920.00 in United States currency which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity.

In violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

**Count Six**

On or about August 30, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**JOSE LUIS GARCIA**

did corruptly attempt to, alter destroy, mutilate, and conceal a record, document, or other object or attempt to do so, with intent to impair its integrity and availability for use in an official proceeding.

In violation of Title 18, United States Code, Section 1512(c) (1), and Title 18, United States Code, Section 2.

**Count Seven**

On or about February 5, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**JOSE LUIS GARCIA**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of \$18,620.00 in United States currency which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity.

In violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

**Count Eight**

On or about February 5, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**JOSE LUIS GARCIA**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of \$52,442.00 in United States currency which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity.

In violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

**Count Nine**

On or about February 5, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**DANIEL SEPULVEDA**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of \$4,100.00 in United States currency which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity.

In violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

**NOTICE OF CRIMINAL FORFEITURE**

**NOTICE OF FORFEITURE  
(21 U.S.C. § 853)**

Pursuant to Title 21, United States Code, Section 853, the United States gives notice to the Defendants charged in Counts One through Five of this Indictment, that upon conviction of a violation of Title 21, United States Code, Sections 841 and/or 846,

1. all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
2. all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation,

is subject to forfeiture.

**NOTICE OF FORFEITURE  
(18 U.S.C. § 982(a)(1))**

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States gives notice to the Defendants charged in Count Six of this Indictment that upon conviction of a violation of Title 18, United States Code, Section 1956, including conspiracy, all property, real and personal, involved in such violation, and all property traceable to such property, is subject to forfeiture.

**MONEY JUDGMENT**

Defendants are notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture, for which the Defendants may be jointly and severally liable, and which is at least 10 million dollars.

**PROPERTY SUBJECT TO FORFEITURE**

Defendants are notified that the property subject to forfeiture includes, but is not limited to, the following personal property:

Asset No.	Asset	Description (including VIN or account number)
1	\$83,920.00 in United States currency	Seized from D.S. on or about August 30, 2019
2	\$275,205.00 in United States currency	Seized from J. G. on or about August 30, 2019
3	\$4,100.00 in United States currency	Seized from D.S. on or about February 5, 2020
4	\$52,442.00 in United States currency	Seized from J.G. on or about February 5, 2020
5	\$18,620.00 in United States currency	Seized from J.G. on or about February 5, 2020

A TRUE BILL

FOREPERSON

RYAN K. PATRICK  
UNITED STATES ATTORNEY

  
ASSISTANT UNITED STATES ATTORNEY